

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL NO.: <u>2:23-cr-240</u>
	)	
	)	18 U.S.C. § 922(a)(1)(A)
	)	18 U.S.C. § 923(a)
v.	)	18 U.S.C. § 924(a)(1)(D)
	)	18 U.S.C. § 924(d)(1)
	)	26 U.S.C. § 5861(c)
	)	26 U.S.C. § 5871
	)	26 U.S.C. § 5872
JEROME DANIEL SANDERS	)	28 U.S.C. § 2461(c)
	)	49 U.S.C. § 80303

**INFORMATION**

**COUNT ONE**

(Unlicensed Dealing in Firearms)

**THE UNITED STATES ATTORNEY CHARGES:**

Beginning at a time unknown to the United States Attorney, but at least beginning in or around January 2022, and continuing until at least on or about June 3, 2022, in the District of South Carolina, the Defendant, **JEROME DANIEL SANDERS**, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in, importing, and manufacturing firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

**COUNT TWO**

(National Firearms Act Violation)

**THE UNITED STATES ATTORNEY FURTHER CHARGES:**

On or about May 18, 2022, in the District of South Carolina, the Defendant, **JEROME DANIEL SANDERS**, knowingly received and possessed a firearm, specifically a silencer as defined in Title 26, United States Code, Section 5845(a)(7);

In violation of Title 26, United States Code, Sections 5861(c) and 5871.

## **FORFEITURE**

### **FIREARM OFFENSES:**

Upon conviction for violations of Title 18 and Title 26, as charged in this Information, the Defendant, **JEROME DANIEL SANDERS**, shall forfeit to the United States all of the Defendants' rights, title, and interest in and to any property, real and personal, in:

- (a) any firearms and ammunition (as defined in 18 U.S.C. § 921)-
  - (1) involved in or used in any knowing violation of 18 U.S.C. § 922, 26 U.S.C. §§ 5822 and 5861 or violation of any other criminal law of the United States.

### **PROPERTY:**

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 26, United States Code, Section 5872, Title 49, United States Code, Section 80303, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Information includes, but is not limited to, the following:

#### **Firearm Parts and Accessories:**

- (1) 5 Bearcreek Barrel Assembly Kits, caliber 7.62x39
- (2) Ghost Gunner CNC Cutting Machine  
Model: N/A, S/N: None
- (3) Tristar 5 Speed Drill Press  
Model: DP Mini, S/N: None
- (4) Ideal Industries Small Arms Kit  
Model N/A, S/N: N/A, NSN 5180-01-670-9469
- (5) 5D Tactical Propack  
Model: N/A, S/N: N/A
- (6) 4 p80 JIG
- (7) Plastic box of miscellaneous firearms parts and accessories

(8) Miscellaneous magazines and firearm parts

(9) 12G 28inch ACCU Choke Shotgun Barrell

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 26, United States Code, Section 5872, Title 49, United States Code, Section 80303, and Title 28, United States Code, Section 2461(c)

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

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Charleston, South Carolina

April 11, 2023